

3. MEU monitors peer-to-peer/BitTorrent networks for acts of distribution of Plaintiff's motion picture through the use of proprietary MaverikMonitor™ software.

4. In general, BitTorrent operates with a number of parties joining in a swarm to both download files and share/upload files with other swarm members, commonly called peers.

5. Members of a swarm broadcast, or register, their Internet protocol ("IP") address with Trackers, hosted by third parties, and Distributed Hash Tables ("DHT's"), generally hosted by the members of a swarm of peers, to allow them to be located and to locate other members sharing a distinct file.

6. Both Trackers and DHT's are publicly broadcasted resources for anyone who wishes to locate and join a swarm to download a file. Files can be movies, T.V. shows, software or any available information being uploaded or distributed. In essence, Trackers and DHT's are the 'phone books' or lists of IP addresses where uploaders/peers register as being a resource for others to download a specific file, or where they look to find lists of others from whom they may download a file.

7. I have reviewed the MaverikMonitor evidence logs, and can confirm the records of infringing activity set forth on Exhibit 1 [Doc. #1-1] to the Complaint,


including IP addresses, times, and hash values, accurately reflect instances of actual observed distribution of Plaintiff's motion pictures by the infringing IP addresses.

8. Based upon my review of the MaverikMonitor evidence logs, there were 8555 instances of infringing activity in the United States and 38567 infringing transactions worldwide logged involving the file name "Hellboy.2019.720p.HC.HDRip.x264-MkvCage.Com.mkv" via the Unique Hash Number 0550544E834856FC1F012A567388F0307CD8A61A.

9. Based upon my review of the MaverikMonitor evidence logs, there were 8387 instances of infringing activity in the United States and 66476 infringing transactions worldwide logged involving the file name "Hellboy.2019.1080p.AMZN.WEBRip.DDP5.1.x264-NTG" via the Unique Hash Number 18031E80B3360664B3641E1B7952172740AD5A63.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: Eggenstein, Germany, Dec 12, 2019.


Daniel Arheidt